

We find that disaggregation by geography within the state of Florida for provisioning metrics or maintenance and repair metrics, as proposed by the ALECs, is not appropriate at this time. This level of disaggregation would add a level of complexity to the performance measure plan that would hinder initial implementation.

We find that the plan's initial purpose is to discern whether discrimination is occurring in the state of Florida on an aggregate basis. If this Commission would like to expand the plan to be able to ascertain if discrimination is occurring in selected areas within the state, that modification could be made at a later date. Currently all BellSouth metrics are reported at the state and/or the BellSouth regional level.

We partially agree with the ALEC Coalition and are requiring some modification of disaggregation at the product level. We find that BellSouth shall disaggregate line splitting from line sharing in order to detect discrimination when the ILEC is not the voice provider of the loop and that EELs shall be a separate category.

We disagree that product disaggregation should include 41 products as proposed by the ALECs. We find disaggregation to all 41 products would be inappropriate at this time because of the lack of apparent activity in many of the categories. BellSouth has proposed approximately 20 levels of product disaggregation. We are requiring approximately 19-24 levels of product disaggregation depending on the domain. Attachment 5 shows the general categories of disaggregation for each metric by BellSouth and approved by us.

We approve the following Ordering product disaggregation:

Resale - Residence
Resale - Business
Resale - Design (Special)
Resale PBX
Resale Centrex
Resale ISDN
2W Analog Loop Design
2W Analog Loop Non-Design
2W Analog Loop w/LNP Design
2W Analog Loop w/LNP Non-Design
UNE Digital Loop < DS1
UNE Digital Loop ≥ DS1

ORDER NO. PSC-01-1819-FOF-TP
DOCKET NO. 000121-TP
PAGE 40

UNE xDSL (ADSL, HDSL, UCL)
Line Sharing
Line Splitting
Standalone LNP
Switch Ports
Loop + Port Combinations
Local Transport
UNE Other Non-Design
UNE Other Design
EELs
Local Interconnection Trunks

We approve the following Provisioning product disaggregation:

Resale Residence
Resale Business
Resale Design
Resale PBX
Resale Centrex
Resale ISDN
Standalone LNP
2W Analog Loop Design
2W Analog Loop Non-Design
 · Dispatch
 · Non-Dispatch (Dispatch In)
2W Analog Loop w/LNP Design
2W Analog Loop w/LNP Non-Design
 · Dispatch
 · Non-Dispatch (Dispatch In)
UNE Digital Loop < DS1
UNE Digital Loop ≥DS1
UNE Loop+ Port Combinations
 · Dispatch Out
 · Non-Dispatch
 · Dispatch In
 · Switch-Based
UNE Switch ports
UNE Combo Other
 · Dispatch
 · Non-Dispatch (Dispatch In)
UNE xDSL (HDSL, ADSL and UCL)
UNE xDSL (HDSL, ADSL and UCL)
w/o conditioning (P-4 only)

ORDER NO. PSC-01-1819-FOF-TP
DOCKET NO. 000121-TP
PAGE 41

UNE xDSL (HDSL, ADSL and UCL)
with conditioning (P-4 only)
UNE ISDN
UNE Line Sharing
UNE Line Splitting
UNE Other Design
UNE Other Non - Design
EELs
Local Transport (Unbundled Interoffice Transport)
Local Interconnection Trunks

We approve the following Maintenance and Repair product disaggregation:

Resale Residence
Resale Business
Resale Design
Resale PBX
Resale Centrex
Resale ISDN
Standalone LNP (Not Available in Maintenance)
2W Analog Loop Design
2W Analog Loop Non - Design
UNE Loop + Port Combinations
UNE Switch ports
UNE Combo Other
UNE XDSL (HDSL, ADSL and UCL)
UNE ISDN
UNE Line Sharing
UNE Other Design
UNE Other Non - Design
Local Interconnection Trunks
Local Transport (Unbundled Interoffice Transport)

Standards

The approved standards are displayed in Attachment 5.

We hereby adopt the BellSouth business rules, disaggregation and standards as proposed, with the exception of the changes reflected in Attachments 3, 4 and 5.

ATTACHMENT 3

BellSouth Measurement	ALEC Proposed Changes to Business Rules, Standards and Disaggregation	Commission Approved
	Preordering	
<p>OSS-1. Average Response Time and Response Interval (Preordering)</p>	<p>Definition: The measurement time should begin when BellSouth receives the query from the ALEC and should end when BellSouth returns a response to the ALEC interface. BellSouth should be accountable for the period of time in which the query and its response are in its possession.</p> <p>Business Rules: (1) BellSouth should exclude syntactically incorrect queries from the measure. The query type measurements should show how long it takes to return valid query information that is useful to the ALEC. Responses to invalid queries could come more quickly than a response to a valid query, thus diluting the results in terms of how quickly ALECs receive the information sought through a syntactically correct query. (2) BellSouth should not be allowed to drag its feet in measuring new query types and new interfaces. It should agree to report on such new queries and interfaces within six to eight weeks after they go into production.</p> <p>Disaggregation: BellSouth must capture all interfaces used, including PSIMS, and it must measure the speed of rejected queries and the number of queries receiving time outs to capture all pre-order response time issues of concern to ALECs. Numerous time outs and slow rejects, as well as the speed of other query responses, can add-up and cause a customers to become frustrated while the ALEC is trying to sign them up to new service.</p> <p>Standard: The ALECs suggest parity with retail.</p>	<p>The date/time stamp shall begin when BellSouth receives a query at the BellSouth Gateway and shall end when the query is transmitted from the BellSouth Gateway.</p> <p>BellSouth shall exclude syntactically incorrect queries from this measure.</p> <p>We find that change control is the appropriate forum for this concern.</p> <p>We find that BellSouth is currently capturing all interfaces used including P/SIMS. We have excluded syntactically incorrect queries, and therefore it is not necessary to measure the time of the rejection.</p> <p>The appropriate benchmark for this measure is parity + 2 seconds. This benchmark is subject to a timing study being conducted by KPMG.</p>
<p>OSS-2. Interface Availability (Pre-Ordering)</p>	<p>Definition: BellSouth's definition should be expanded to include all interfaces, not just legacy systems. It is of no use to a ALEC if the legacy system is up, but the interface needed to access it is down.</p>	<p>It appears that all ALEC interfaces are included in DAC 1 Exhibit 16 with the exception of Robotag. BellSouth shall clarify language to include Robotag.</p> <p>The business rules shall</p>

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	<p>Business Rules: BellSouth's tortured and unsubstantiated business rules place severe limitations on what is considered an outage. All such exclusions should be eliminated from this measure.</p> <p>Data Retained: BellSouth should be required to post its own scheduled hours of OSS availability on its web-site as it currently does for ALEC OSS availability.</p>	<p>be revised to reduce limitations on what is considered an outage.</p> <p>DAC-1 Exhibit 16 reflects that reporting for RNS/ROS are under development.</p>

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OSS-3. Interface Availability (Maintenance & Repair)	<p>Disaggregation: BellSouth needs to disaggregate by all its OSS Systems. If any route to that OSS varies, then each interface route should be reported separately.</p> <p>Data Retained: BellSouth should be required to post its own scheduled hours of OSS availability on its web-site as it currently does for ALEC OSS availability. BellSouth also must not do system maintenance more often in ALEC prime operational hours: 5 to 9 p.m. versus its own prime hours: 9 to 5 p.m.</p>	<p>Only relevant M&R interfaces shall be included since this is M&R interface measure availability. We find BellSouth's proposed level of reporting appropriate.</p> <p>BellSouth shall post its own scheduled hours of OSS availability. DAC-1 reflects that the BellSouth TAFI availability will be reported on the interconnection website. BellSouth shall not schedule normal maintenance during the hours of 8a.m.-9p.m. M-F.</p>
OSS-4 Response Interval (Maintenance & Repair)	No change proposed	
PO-1 Loop Makeup - Response Time - Manual	<p>Disaggregation: BellSouth does not disaggregate by type of loop.</p> <p>Standard: Its proposed benchmark of 3 business days is more lenient than the ALEC proposed 72 hour interval.</p>	<p>Disaggregation by loop type is not necessary for this metric.</p> <p>The benchmark of 3 business days is appropriate.</p>
PO-2: Loop Makeup - Response Time - Electronic	<p>Standard: BellSouth proposes a benchmark of 90% in 5 minutes for now, with reassessment after 6 months. The Georgia Commission ordered a short-term benchmark of 90% within 5 minutes, and a benchmark after six months of 95% within 1 minute. At the least, this approach should be adopted. Better yet, the benchmark of 95% within 1 minute should be adopted immediately.</p> <p>Moreover, BellSouth should be required to provide this information (and meet this standard) via EDI as well as TAG.</p>	<p>The appropriate benchmark shall be 95% in 1 minute.</p> <p>EDI is not a pre-ordering system and therefore is not applicable in this measure.</p>
Ordering		
O-1: Acknowledgment Message	Business Rules: The following BellSouth business rule needs to be clarified: "If more than one ALEC uses the same ordering	BellSouth shall clarify the business rule.

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Timeliness	<p>center, an Acknowledgment Message will be returned to the 'Aggregator', however, BellSouth will not be able to determine which specific ALEC this message represented." Obtaining individual results is vital to ALECs. This issue is especially critical as this measure is a proposed Tier 1 measure in BellSouth's remedy plan.</p> <p>Standard: BellSouth proposes a of 90% within 30 minutes at first for EDI (moving to 95% within 30 minutes after six months) and 95% within 30 minutes for TAG. The benchmark should be 98% within 15 minutes for both EDI and TAG immediately. The ALEC intervals are generous in that the acknowledgment response is part of the transmission "handshake" and should normally be returned in seconds from receipt of an order.</p>	A benchmark of 95% ≤ 30 minutes is appropriate

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<p>O-3. Percent Flow-through Service Requests (Summary)</p> <p>O-4. Percent Flow-through Service Requests (Detail)</p> <p>O-5. Flow-through Error Analysis</p>	<p>Exclusions: BellSouth's SQM should not exclude orders that fall to manual, through no fault of the ALEC, from the metric. It may measure whether the orders it has designed to flow through actually do, but it should also show the whole story on what orders have not yet been designed to flow through. The purpose of this measure should be to measure the percent flow-through capability of BellSouth's ordering systems. ALECs cannot improve the flow-through of error free orders, only BellSouth can. Therefore, it should be held accountable for its decision not to provide flow-through. Further, BellSouth is obligated to provide parity service. As it has provided no evidence that such orders fall out for manual processing for its retail operation, it should not be allowed to exclude such orders from its flow-through calculation for ALECs.</p> <p>At a minimum, the Commission should establish a timely sunset provision on this exclusion to cause BellSouth to improve its flow-through performance. Fall out from errors occurring in SOCS should be included in the metrics, as should all fall out resulting from BellSouth system issues.</p> <p>Standard: BellSouth's benchmarks may be appropriate if total flow through is being measured, but if only orders designed to flow through as BellSouth currently proposes are counted then the benchmark should be a strict 98%. ALECs propose that both total and achieved/designed flow through performance should be measured.</p>	<p>BellSouth shall produce separate results with and without manual fallout.</p> <p>The appropriate benchmarks for total flow through are: Residence 95% Business 90% UNE 85% LNP 85%</p>
<p>O-7 Percent Rejected Service Requests</p>	<p>Business Rules: BellSouth must identify all errors in orders in parallel, rather than catching and sending back each error one at a time. BellSouth's current serial process of rejecting orders extends the time for ALECs finally getting an order accepted.</p>	<p>The order edit routines at BellSouth are appropriate and consistent with those in other jurisdictions.</p>
<p>O-8. Reject Interval</p>	<p>Business Rules: BellSouth's business rules and formula should be changed to require BellSouth to calculate this measure as follows. The measured interval should end upon delivery by BellSouth of a response to the ALEC interface. BellSouth should measure the entire interval up to the point that it returns the rejected LSR to the ALEC. BellSouth should be accountable for the time in which the rejection is in its possession.</p> <p>For non-mechanized orders, BellSouth</p>	<p>We agree and find that the business rules proposed by BellSouth require a date/time stamp in the ALEC interface (EDI, LENS or TAG). Previously the date/time stamp was in LEO.</p> <p>We find that BellSouth is using the date/time</p>

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	<p>indicates that it is using LON, its order tracking system for non-mechanized orders. Again, BellSouth provides no justification and the ALECs request that BellSouth be required to use the actual stop time from the fax server as it uses the date/time stamp from the fax for the receipt of the order.</p> <p>Further, when a ALEC uses multiple OSS interfaces the reject interval should be measured for each one. Different interfaces can produce different rejection intervals, and disaggregated monitoring of such differences are needed.</p> <p>Standard: BellSouth's intervals for partially mechanized orders are too long. Such rejections should be received in 5 hours not 48. Totally manual orders may have a longer 24 hour interval. These intervals should include trunks. BellSouth's proposed trunk rejection intervals--4 days--are too long to wait to learn that its order had not even been initiated yet.</p>	<p>stamp that reflects the time the rejection is automatically sent back to the ALECs via LON. LON automatically sends a fax to the ALEC.</p> <p>We disagrees with disaggregation of this interval by interface.</p> <p>We agree and find that the benchmark for partially mechanized shall be 95% ≤ 10 hours. The non-mechanized benchmark shall be 95% ≤ 24 hours. The benchmark for trunks 95% ≤ 24 hours.</p>
O-9. Firm Order Confirmation Timeliness	<p>Business Rules: BellSouth's business rules and formula should be changed to require BellSouth to calculate this measure as follows: The measured interval should end upon delivery by BellSouth of a response to the ALEC interface.</p> <p>For non-mechanized orders, BellSouth indicates that it is using LON, its order tracking system for non-mechanized orders. Again, BellSouth provides no justification and the ALECs request that BellSouth be required to use the actual stop time from the fax server as it uses the date/time stamp from the fax for the receipt of the order.</p> <p>Also, if ALECs order inbound BellSouth to ALEC trunks through ASRs, the confirmation of those ASRs should be included in this metric. ALECs also have proposed a separate measure to capture how quickly BellSouth responds to inbound trunk requests whether made through ASRs to which BellSouth sends a confirmation or by a Trunk Group Service Request to which BellSouth responds by sending an ASR. Either as part of the confirmation or a separate metric, measurement of the time it takes BellSouth to respond is critical to monitor. ALECs often wait long times for ILECs to send</p>	<p>We agree and find that BellSouth's proposed business rules state that the date/time stamp is captured in EDI, LENS, and TAG.</p> <p>We agree and find that BellSouth is using the date/time stamp that reflects the time the rejection is automatically sent back to the ALECs via LON. LON automatically sends a fax to the ALEC.</p> <p>We agree and find that the BellSouth proposal in DAC-1 Exhibit 6 addresses the measurement of local interconnection trunks. Interconnection trunks are specified in the business rules and a separate benchmark has been established for this level of disaggregation.</p>

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	<p>the ASRs when capacity is inadequate to carry calls from ILEC customers to ALEC customers. ALECs seek to have adequate inbound trunk capacity in place before adding new customers that would cause blocking for new and existing customers. - Current trunking measurements do not capture this missing response time on inbound trunks.</p> <p>BellSouth also should confirm facilities availability for all orders, not just trunks, before issuing a confirmation. If ALECs cannot depend on the due date given them then confirmations are useless. Too often in BellSouth territory ALECs receive confirmations immediately followed by notice that the order is being held for facilities. Facilities checks should be a standard requirement for all orders.</p> <p>Standard: While BellSouth and ALECs agree the interval for confirmation of fully mechanized or flow through orders, BellSouth has proposed extremely long intervals for confirming partially mechanized and trunk orders. BellSouth should establish intervals of five hours for partially mechanized orders, similar to the intervals agreed to by SBC's Pacific Bell and Ameritech affiliates. SWBT has a five hour confirmation interval for all electronic orders. Manual orders, including trunk orders should be confirmed in 24 hours.</p>	<p>We agree that BellSouth shall conduct electronic facilities checks to ensure due dates delivered in FOCs can be relied on.</p> <p>The benchmark for non-mechanized shall be 95% \leq 24 hours. Partial Mechanized 95% \leq 10 hours. Trunk orders shall be 95% \leq 36 hours.</p>

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O-10: Service Inquiry With LSR Firm Order Confirmation (FOC) Response Time Manual	Standard: The benchmark for this metric should combine the interval for Manual Loop Qualification with the appropriate FOC interval. At most, the benchmark should be 95% in 3 days for electronic orders and 4 days for manual orders.	We have no evidence to support a change at this time. This is a new metric and the benchmark is $95\% \leq 5$ business days.
O-11: Firm Order Confirmation and Reject Response Completeness	Business Rules: BellSouth should include partially and non-mechanized orders.	We agree that partially and non-mechanized orders shall be included in this metric.
O-12: Speed of Answer in Ordering Center	Standard: This metric should not be diagnostic. The benchmark should be 95% in 20 seconds and 100% in 30 seconds.	We agree there shall be a standard for this measure. The standard shall be parity with retail.
O-12 Speed of Answer (Ordering Center)	Disaggregation: The reports should be by each help desk center the ALECs call into as each may have different answering times.	We disagree with this level of disaggregation.
O-13 LNP Percent Rejected Service Requests	Exclusions: BellSouth should not be allowed to exclude non-mechanized orders.	We agree and find that BellSouth has eliminated this exclusion in the proposed business rules.
O-14 LNP Reject Interval Distribution and Average Reject Interval	<p>Exclusions: BellSouth should not be allowed to exclude non-mechanized orders from this measure.</p> <p>Business Rules: BellSouth's business rules for the start and stop times for this measure are unclear. BellSouth should be accountable for the LSR while it is in its possession and should change its business rules to reflect that it uses the date/time stamps in EDI, LENS and TAG to measure this interval.</p> <p>Standards: BellSouth has proposed extremely long intervals for returning partially mechanized orders. BellSouth should establish intervals of five hours for partially mechanized orders, similar to the intervals agreed to by SBC's Pacific Bell and Ameritech affiliates.</p>	<p>We agree and find that BellSouth has eliminated this exclusion in the proposed business rules.</p> <p>We agree and find that BellSouth shall change the business rules to reflect the use of date/time stamp in the EDI, LENS and TAG gateway.</p> <p>We partially agree and find that the benchmark for partially mechanized shall be $95\% \leq 10$ hours and find that the non-mechanized benchmark shall be revised to $95\% < 24$ hours.</p>

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<p>O-15 LNP Firm Order Confirmation Timeliness Interval Distribution and Firm Order Confirmation Average Interval</p>	<p>Exclusions: BellSouth should not be allowed to exclude non-mechanized orders from this measure.</p> <p>Business Rules: BellSouth's business rules for the start and stop times for this measure are unclear. BellSouth should be accountable for the LSR while it is in its possession and should change its business rules to reflect that it uses the date/time stamps in EDI, LENS and TAG to measure this interval.</p> <p>Standards: BellSouth has proposed extremely long intervals for returning partially mechanized orders. BellSouth should establish intervals of five hours for partially mechanized orders, similar to the intervals agreed to by SBC's Pacific Bell and Ameritech affiliates. SWBT has a five hour return interval for all electronic orders. Manual orders should be returned in 24 hours.</p>	<p>We agree and find that BellSouth shall not exclude non-mechanized from reporting. DAC-1 reflects that non-mechanized is "under development".</p> <p>We agree and find that BellSouth shall change the business rules to reflect the use of date/time stamp in EDI, LENS and TAG.</p> <p>We agree and find that the benchmark shall be partially mechanized, 95% ≤ 10 hours and the non-mechanized benchmark shall be revised to 95% ≤ 24 hours.</p>
Provisioning		
<p>P-1 Mean Held Order Interval and Distribution Intervals</p>	<p>Business Rules and Calculations: BellSouth's approach to this measure is fatally flawed in that it allows any held order which is closed prior to the end of the month to be excluded from this calculation. Therefore an order could be held on the 1st of the month, and not be released until the 29th, but not appear in this report. BellSouth should be required to report the average delay of all orders held for lack of facilities past the due date.</p> <p>Disaggregation: ALECs need to see how many orders are held by all products, including the various xDSL-capable loops with and without conditioning, line-sharing and splitting requests, etc. The results should also be disaggregated by the reason for the hold: "facilities," "load," and "other" at the very least.</p>	<p>We agree and find that BellSouth shall capture all orders held past due dates, not only those open at the close of the reporting period.</p> <p>We agree and note that BellSouth currently includes the level of disaggregation in DAC-1. Hold reason data is currently captured in raw data. ALECs can use the raw data to investigate any specific concerns. We find that disaggregation by hold reason is not appropriate.</p>
<p>P-2 Average Jeopardy Notice Interval and Percentage of Orders Given</p>	<p>Business Rules: ALECs need to have an equivalent opportunity to plan with customers for situations where an order appears to be in jeopardy as does BellSouth. Therefore, if any BellSouth representative can check on the status of the order, then ALECs need access to that same information sent through</p>	<p>We find that ALEC have the opportunity to check the status of any order through CSOTS. We are unclear what the ALECs are requesting here.</p>

<p>Jeopardy Notices</p>	<p>electronic or manual notices as requested.</p> <p>Calculation: The calculation should be based on the orders placed in jeopardy not just those orders sent jeopardy notices. To calculate the metric as proposed by BellSouth would understate any problem in ALECs not receiving notices on orders that are going to be missed.</p>	<p>We disagree and find that this measure is capturing notices. We are unsure how "orders placed in jeopardy" would be determined. If an order is placed in jeopardy, a notice is provided to ALECs.</p>
<p>P-3 Percent Missed Installation Appointments</p>	<p>Business Rules: Disconnect and From orders should be disaggregated and reported separately, rather than be excluded as BellSouth proposes. ALECs need to see that their requests to disconnect customers from service are timely as well. This will help avoid billing disputes with the terminated customer.</p> <p>Business Rules: The due date on any firm order confirmation followed by a notice of facilities hold status should be considered a missed appointment, because BellSouth should have checked facilities before issuing the confirmation. (See e.spire testimony.)</p> <p>Business Rules/Calculation: BellSouth includes only misses of the original due date. Therefore, if an appointment is rescheduled, and also missed, BellSouth does not report it. This is misleading and can mask discriminatory behavior. BellSouth should be required to report on all its missed appointments.</p> <p>Calculation: The denominator is also incorrect. BellSouth uses the number of orders completed in the reporting period, but it should use the number of orders due in the reporting period. Orders could and likely would be completed in one month, but not due until the next month, and should not be included.</p> <p>Business Rules: This measure should be changed to include time, when time specific appointments are ordered by the ALEC. This measure should evaluate the level of service ALECs are paying for and to which BellSouth is committing, i.e. if the appointment is time specific, the measurement should be time specific.</p> <p>Disaggregation: ALECs need to see how many orders are held by all products, including the various xDSL-capable loops with and without conditioning, line-sharing and splitting requests, etc.</p>	<p>We disagree. This measurement was intended to focus on installation appointments. We see no justification for changing the exclusion of Disconnect and From orders.</p> <p>We find that missed appointments caused by pending facilities are calculated in the missed installation appointment metric currently if the pending facilities extend beyond the due date.</p> <p>We agree that subsequent missed appointment shall be included in the calculation of this metric.</p> <p>We disagree and find that the appropriate denominator is orders completed in the reporting period.</p> <p>We agree that Missed Installation Appointment shall be modified to capture time specific appointments when the specific time is missed.</p> <p>We partially agree and find that the level of disaggregation proposed by BellSouth which include xDSL and line sharing is appropriate.</p>

<p>P-4. Average Completion Interval (OCI) Interval Distribution</p>	<p>Business Rules: Disconnect and From as well as expedite orders should be disaggregated and reported separately, rather than be excluded as BellSouth proposes. These usually are very short intervals that can skew total results, but ALECs need to know the speed at which disconnect and expedite orders are being met.</p> <p>Business Rules: BellSouth should be required to modify its business rules and calculation to reflect the appropriate interval. The appropriate starting point for this measure is when BellSouth receives a valid LSR and the appropriate ending point is when a completion notice is sent to the ALEC. Both the New York and Texas performance measures plans begins this interval with the date that a valid service request is received, not when the order is entered into the SOC system as proposed by BellSouth. BellSouth's approach eliminates what could be considerable time from the interval, particularly for non-flow through orders. BellSouth is in control of that time, not the ALEC, and should be accountable for it.</p> <p>Disaggregation: Orders designated "pending facilities" should be a level of disaggregation, as well as the other proposed levels of disaggregation in KR-2. ALECs need to see if BellSouth's orders designated as pending facilities get completed at a faster pace than ALEC orders that were pending facilities.</p> <p>ALECs need to see disaggregation by the various xDSL-capable loops, line-sharing and splitting requests, etc. As mentioned above, information on whether these products also include conditioning should be a level of disaggregation. ALECs need to see if they are receiving line conditioning on orders in a non-discriminatory fashion.</p> <p>Disaggregation: BellSouth should be required to report its provisioning measures that have a parity standard by type of work performed. BellSouth currently reports by dispatch and non-dispatch. However, this is causing misleading results as BellSouth combines central office and field work in the dispatch category. BellSouth should be required to report by non-dispatch, dispatch in (or CO work), and dispatch out (or field work).</p> <p>Instead of excluding orders with intervals</p>	<p>We disagree with any change to the exclusions for this metric.</p> <p>We partially agree with this proposal. The interval shall begin when the FOC is generated, as BellSouth proposed, and conclude when a completion notice is sent to the ALEC.</p> <p>We disagree that this level of disaggregation is needed at this time.</p> <p>We partially agree with this proposal and find that BellSouth currently includes adequate xDSL and Line Sharing disaggregation in its proposal.</p> <p>We agree that BellSouth shall disaggregate provisioning metrics as shown in Attachment 5.</p> <p>We disagree that BellSouth should disaggregate for later than offered due dates.</p>
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	later than the offered interval, they should be disaggregated and reported separately.	
P-4: Average Completion Interval	Standard: BellSouth's proposed intervals for xDSL with and without conditioning are too long. Interval for conditioning should be no more than 5 days.	We find the standards for xDSL with and without loop condition of 7 and 14 days are too long. The standard shall be 5 and 12 days respectively.
P-5: Average Completion Notice Interval	<p>Exclusions: BellSouth should be required to remove its exclusion of non-mechanized and partially mechanized orders.</p> <p>Disconnections and From orders should be included in the measurement but reported separately to track performance,</p> <p>BellSouth should be required to modify its business rules and calculation formula to indicate the measured interval ends upon delivery by BellSouth of a notice of completion to the ALEC interface (LENS, EDI, or TAG) or, if manual, the date/time stamp from the fax machine or server. BellSouth should be accountable for the time in which the completion information is in its possession.</p> <p>Standard: Completion notices need to be delivered promptly after actual physical work completion so ALECs know when they own new customers and must respond to their needs. If the retail analog selected operates at the interval stated by BellSouth in collaborative (an hour to an hour and a half) that is acceptable but most completion notices need to be delivered at least one hour after work completion.</p>	<p>We agree and find that the BellSouth SQM proposal for this measure has removed the exclusion for both Non-Mechanized and Partially Mechanized.</p> <p>We disagree with removing this exclusion and creating a separate level of disaggregation.</p> <p>We agree and find that the BellSouth SQM proposal for this measure has included an end time stamp of when the notice is transmitted to the ALEC interface. The end time stamp for non-mechanized orders should be the time stamp from the fax machine or server via LON.</p> <p>We agree and find parity with retail appropriate.</p>
P-6: Coordinated Customer Conversion Interval	<p>Exclusions: Cancelled orders should be included to capture all the hot cut activity (even those attempts that prompt the customer to cancel the order) in the metric.</p> <p>Standard: BellSouth's interval represents a flawed calculation that does not depict the actual performance on each individual cut. In any event, BellSouth's 15 minutes per loop is excessive and even the ALEC's standard is generous considering it should not take more than 5 minutes per loop for conversion.</p>	<p>We find that this is an inappropriate measure for capturing order cancellations. We find that cancelled orders shall be excluded.</p> <p>We find that 95% < 15 minutes is appropriate at this time.</p>

<p>P6-A Coordinated Customer Conversions Hot Cut Timeliness % within Interval and Average Interval</p>	<p>Exclusions: Cancelled orders should be included to capture all the hot cut activity (even those attempts that prompt the customer to cancel the order) in the metric.</p> <p>Business Rules: The ALECs request that this measurement be modified to include the entire hot cut interval or replaced with the hot cut timeliness measure requested by the ALECs in my direct testimony. It is important that not only the start time of the cut, but the entire interval, including acceptance testing with the ALEC be included in this measure.</p> <p>Business Rules: Metric should be clarified to make clear that an early cut would be included as a missed appointment if cut was restarted within original window. Thirty minute buffer is excessive.</p> <p>The loop should not be considered delivered until BellSouth and the ALEC have checked whether electrical continuity exists. Customers will not tolerate timely delivery of non-working loops.</p> <p>Disaggregation: Particularly with the advent of line sharing and splitting, disaggregation by all the types of digital and xDSL loops offered by BellSouth is critical to detect problem areas with hot cuts.</p> <p>Standard: The benchmark should be 95% completed within cut over window. BellSouth only appears to be measuring whether the cut started on time, but does not measure whether it finished within the cut over window proposed by the ALECs.</p>	<p>We find that cancelled orders should be excluded from this metric.</p> <p>We agree and find that BellSouth has included a notification provision in its proposed SQM for this metric.</p> <p>We disagree that + or - 15 minutes of schedule start time is excessive.</p> <p>Acceptance testing results are captured in the BellSouth proposed metric P-7.</p> <p>We disagree that product disaggregation to the extent proposed is needed at this time.</p> <p>We find the benchmark of 95% + or - 15 minutes is appropriate.</p>
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<p>P6-B: Coordinated Customer Conversions - Average Recovery Time</p>	<p>Exclusions: Only verified end user and ALEC caused reasons should be excluded. (i.e. the ALEC has to agree).</p> <p>Business Rules: Outages during and before the cut are included, not just those that can be reported after order completion through maintenance systems. BellSouth may separate out the later group of restorals and measure them as a disaggregation of Maintenance Average Duration with the same benchmark if it prefers.</p> <p>Standard: The benchmark should be 98% in 1 hour and 100% in 2 hours. These outages were caused by BellSouth's cut-over errors and, thus, should be easy for it to diagnose and resolve.</p>	<p>We agree that exclusions relating to end-user and ALEC-caused reasons shall require ALEC agreement.</p> <p>We disagree with the ALEC proposal to disaggregate Maintenance Average Duration further.</p> <p>We have no evidence on which to support the assertion that the benchmark should be 98% in 1 hour. Since this is a new metric, we find that the benchmark shall be established at the 6-month review period.</p>
<p>P-6C: Coordinated Customer Conversions- % Provisioning Troubles Received W/i 7 days of a Completed Service Order</p>	<p>Standard: The benchmark should be 1%, not 5 % as BellSouth proposes.</p>	<p>We have no evidence on which to support the assertion that the benchmark should be 1% versus 5%. We find that the benchmark for the measure shall be reevaluated at the 6-month review period.</p>

P-7: Cooperative Acceptance Testing - % of xDSL Loops Tested	<p>Exclusions: BellSouth should report the number of exclusions (ALEC caused failures monthly) so ALECs can determine whether or not their reports match up.</p> <p>Definition: The following change should be made: (1) In the Definition Portion, add "A loop will be considered successfully cooperatively tested when both the ALEC and ILEC representatives agree that the loop has passed the cooperative testing" and (2) In the SEEM Analog/Benchmark, replace "95 percent of Lines Tested" with "95 percent of Lines Tested Successfully Passing Cooperative Testing."</p> <p>Standard: The benchmark should be 99.5%.</p>	<p>We agree that the number of exclusions shall be captured in the raw data so that ALECs can verify accuracy.</p> <p>BellSouth agreed at hearing to further define that successful testing means successful to both the ALEC and BellSouth</p> <p>We have no evidence to support an increase to the benchmark at this time.</p>
P-8 Percent Provisioning Troubles within 30 days of Service Order Completion	<p>Business Rules: The metric should include all trouble reports arising from the same order. A customer may experience several service disruptions related to provisioning problems and each should count as a provisioning trouble.</p>	<p>We disagree and find that BellSouth is currently capturing the troubles appropriately. The first trouble is captured as a Provisioning Trouble within 30 day of service Order Completion. Subsequent Troubles are captured in the repeat troubles within 30 days metric. We find this appropriate.</p>
P-9 Total Service Order Cycle Time (TSOCT)	ALECs did not analyze this measure.	
P-10 LNP Percent Missed Installation Appointments	<p>See missed appointment issues in P-3 above.</p> <p>Exclusions: The measure should be modified to include non-mechanized orders. The Commission should not allow BellSouth to discriminate against ALECs who place orders via non-mechanized means.</p>	<p>See P-3 above</p> <p>We agree and find that BellSouth has eliminated the non-mechanized exclusion in the SQM Proposal for this measure in DAC-1, Exhibit 16.</p>
P-11 LNP Disconnect Timeliness Interval	<p>Business Rules: BellSouth should be required to actually perform the disconnect activity before completing the service order in SOCs.</p> <p>Exclusions: BellSouth should be required to include non-mechanized orders. See comments in measure above.</p>	<p>We agree and find that the BellSouth-proposed SQM for this metric reflects this proposal.</p> <p>We agree and find that BellSouth has eliminated the non-mechanized exclusion in the SQM proposal for this measure in DAC-1, Exhibit 16.</p>

Maintenance and Repair		
MR-1 Missed Repair Appointments	<p>Exclusions: BellSouth may exclude customer provided or ALEC equipment troubles from the metric but it should report the number of exclusions monthly.</p> <p>Business Rules: The end time should be when the ALEC receives notice that the service is restored. This will enable the ALEC to notify BellSouth promptly if it disagrees that the service has been restored.</p>	<p>We disagree at this time. Causes for Missed Repair Appointments are included in the data retained and ALECs have the capability of investigating the problem when necessary.</p> <p>We disagree. This metric measures missed appointments. For analog purposes it is necessary that this comparability be maintained.</p>
MR-2 Customer Trouble Report Rate	<p>See MR-1 above.</p> <p>Standard: The standard should be parity or no worse than the end user standard in Florida. Otherwise ALECs will not be able to meet the end user standard.</p>	<p>See response to MR-1 above.</p> <p>We agree and find that parity is the standard proposed by BellSouth in DAC-1, Exhibit 16.</p>
MR-3 Maintenance Average Duration	<p>Exclusions: Customer and ALEC equipment troubles may be excluded but should be reported separately for the reasons stated in MR-1. BellSouth also should not exclude troubles that have lasted more than 10 days.</p> <p>Business Rules: The trouble report should not be considered closed or service restored until the ALEC is given notice. "Restore" means to return to the normally expected operating parameters for the service and verification by the ALEC that the service has been restored. ALECs must be able to verify when informed that the trouble is closed that service has been restored to the customer. This will reduce the number of repeat trouble reports for services that were prematurely closed by BellSouth, but the ALEC customer's service is still impaired.</p> <p>Disaggregation: All maintenance metrics should be disaggregated by trouble type so ALECs can ascertain the specific types of problems (Central Office, Loop, etc.) where they may not be receiving parity service. This also protects BellSouth as dispatch troubles generally take longer than central office troubles and could make the metric look out of parity only because the ALEC had more dispatch troubles. So such disaggregation is particularly crucial for trouble duration.</p>	<p>See response to MR-1 above. Trouble reports greater than 10 days have to be removed from exclusion in the BellSouth SQM proposed in DAC-1, Exhibit 16.</p> <p>We disagree. This metric measures duration of troubles. For analog purposes it is necessary that this comparability be maintained.</p> <p>We disagree that disaggregating by trouble type is necessary and find that this is excessive disaggregation. However, ALECs can analyze their results by disposition and cause code by reviewing the raw data. BellSouth is currently disaggregating by dispatch for this measure.</p>

	<p>Business Rules: BellSouth should clarify what it means by a "correct" repair request and how an ALEC is informed that reporting of trouble is incorrect.</p>	<p>We agree that this clarification would be useful.</p>
MR-4 Percent Repeat Troubles in 30 Days	<p>Business Rules: Customer and ALEC equipment trouble exclusions should be reported separately (See MR-1).</p> <p>Calculation: The denominator for the metric should be all repeat troubles received in the month, rather than all troubles closed. Using BellSouth's calculation could understate the problem for a month in which numerous troubles have not been closed by the end of the month.</p> <p>Standard: The standard should be parity or no worse than the state's end user standard. Otherwise the ALEC could not meet that standard.</p>	<p>See MR-1 response</p> <p>We disagree that the denominator should be changed.</p> <p>We agree and BellSouth's proposed standard is parity.</p>
MR-6 Average Answer Time (Repair Center)	<p>Disaggregation: If there is more than one maintenance center, then the results of both centers should be shown separately to monitor each center's performance.</p> <p>Standard: 95% calls should be answered in 20 seconds, and 100% in 30 seconds to ensure prompt taking of trouble reports. In no case, should the answer time be worse than the end user requirement. Benchmark should be the better of parity or at least the end user standard.</p>	<p>We find the proposed level of disaggregation adequate. BellSouth currently disaggregate between the UNE center and the BRC repair center for ALECs.</p> <p>We find that parity is the appropriate standard as proposed in BellSouth DAC-1, Exhibit 16.</p>
MR-7: Mean Time to Notify CLEC of Network Outages	<p>Standard: Parity by design needs to be confirmed by KPMG. If confirmed, no metric is needed, just information on how to get the same notices at the same time as BellSouth.</p>	<p>Parity by design will be confirmed by KPMG during the OSS test.</p>
B-1. Invoice Accuracy	<p>Business Rule: Invoice accuracy should not be based on adjustment dollars, as BellSouth is in control of whether or not it grants an adjustment, and is therefore in control of the outcomes of this measurement.</p>	<p>We agree that this measure presents problems; however, no evidence has been provided to correct the deficiencies in the measure. We propose adding the number of bills and bill adjustments to the current metric.</p>

B-2. Mean Time to Deliver Invoices	<p>Calculation: This measure should be modified to be based on percent invoices received on time, or the Commission should adopt the Percent On-Time Mechanized Local Service Invoice Delivery measure recommended by the ALECs.</p> <p>Exclusions: Bills rejected because of BellSouth formatting or content errors should be included.</p>	<p>We disagree with modifying this measure.</p> <p>We agree that this exclusion shall be eliminated.</p>
B-3 Usage Data Delivery Accuracy	<p>Calculation: ALECs believe the metric should reflect the number of records not data packs delivered accurately. This is more in line with how accuracy has been calculated in the past for usage data..</p>	<p>We agree that the measure shall be modified to reflect records rather than data packs</p>
B-6 Mean Time to Deliver Usage	<p>Business Rule: ALECs believe that the measurement should begin with the generation of data by the ALEC retail customer or ALEC access customer (by the AMA recording equipment associated with the ALEC switch.). This will ensure that all usage (local and associated access) are covered by this metric.</p>	<p>We find that the BellSouth measure shall be modified to reflect differences between date data is mailed and date data is generated by customer/Total record volume delivery</p>
OSDA		
OS-1 OS/DA Speed to Answer Performance/Average Speed to Answer	<p>Exclusions: BellSouth should not exclude call abandonment times. The customers likely abandoned the call because of lengthy waits for a response and such time should be included in the metric calculation.</p> <p>Standard: ALECs propose that 95% of calls be answered in 10 seconds. The metric would have to be changed from an average measure to a Percent in 10 Seconds to suit this benchmark. Otherwise the benchmark needs to be restates as an acceptable average. In no case, should the standard be worse than the end user standard for answering such calls, as the ALECs need to meet the end user standard. ALECs want third-parity verification of BellSouth's claims that this measure is parity by design.</p>	<p>We agree and find that the BellSouth SQM proposed for this metric does not exclude calls that are abandoned. The time at which a call is abandoned is captured.</p> <p>We find that this metric is appropriate as proposed by BellSouth and is parity by design. We find that this will be confirmed by the OSS Third-Party Test.</p>

OS-2 OS/DA Speed to Answer Performance/Percent Answered in X Seconds	Business Rules: ALECs propose that OS/DA performance be measured with a single metric, but disaggregated for OS and DA.	We find the BellSouth proposed method for capturing metric appropriate.
E911		
E-1 E911 Timeliness E-2 E911 Accuracy E-3 E911 Mean Interval	Standard: ALECs have no changes to these measures but want third-parity verification of BellSouth's claims that its E911 update processes are parity by design.	Parity by design will be validated in the OSS Third-Party Test.
Trunk Group Performance		
TGP-1 Trunk Group Performance - Aggregate	<p>Business Rules: ALECs are seeking the inclusion of 911 trunks in this measure along with the OS/DA trunks that BellSouth has agreed to add.</p> <p>Disaggregation: BellSouth must disaggregate reporting by trunk type and design type. Combining trunks built to different blocking standards can hide blocking problems.</p> <p>Standards: The measure should be based on parity in not exceeding the various blocking design levels. See KK-3.</p>	We are unclear what the ALECs are proposing.
TGP-2 Trunk Group Performance - ALEC Specific	See TGP-1.	See TGP-1.
Collocation		
C-1 Collocation Average Response Time	Standards: ALECs propose to change metric to a proportion and set standard at 95% in 10 calendar days.	We disagree. The standard established for this measure resulted from a previous docket.
C-2 Collocation Average Arrangement Time	<p>Business Rule: Further, a collocation should not be considered complete until the ALEC accepts the collocation and associated cable assignment information is provided. This definition has been adopted in New York and other states in the Verizon region.</p> <p>Disaggregation: Disaggregation needs to also include Remote collocations and separate out the augment types by differing intervals (i.e. 90 day physical augment from 45-day physical augment) for reporting average intervals.</p>	<p>We agree and find that the appropriate language shall be added.</p> <p>We find the current level of disaggregation appropriate.</p>
C-3 Collocation Percent Due Dates Missed	Standard: Due to control BellSouth has over the committed due date and the long standard intervals, ALECs recommend that no misses should be allowed.	We find a benchmark of 95% on time would be appropriate. Texas uses this same standard.

Database Update Information		
D-1: Average Database Update Interval	Standard: Parity by design needs to be confirmed by KPMG.	Parity by design will be validated in the OSS Third-Party Test.
D-3: Percent NXXs and LRNs Loaded by LERG Effective Date	Business Rules: BellSouth's business rules should not define the interval by the completion of initial interconnection trunk groups when that happens after the LERG effective date. Otherwise, BellSouth could delay delivery of trunks to cover late LERG updates. The LERG effective date should be the end time in all cases.	We disagree that a change is needed.
Change Management		
CM-1 Timeliness of Change Management Notices	<p>Business Rules: Business rules do not state whether ALECs receive both notice and documentation within specified time before implementation.</p> <p>Disaggregation: Need to disaggregate by notice type (i.e. BellSouth initiated, ALEC initiated, industry forum, regulatory or emergency, for example)</p> <p>Standards: Standards in underlying change management process are unclear and reporting on website does not match business rules in the metrics.</p>	<p>We find that this proposal is addressed in CM-3.</p> <p>We disagree and find that disaggregation by notice type is unnecessary.</p> <p>We find that the benchmark for this measure shall be 98% on time.</p>
CM-2 Average Delay Days for Change Management Notices	<p>(See Above.)</p> <p>Standards: Benchmark should be 95% in 5 days. For 30 days it should be a shorter delay day interval of no more than 3 days.</p>	We agree that the proposed benchmark of 95% in 5 days is appropriate.
CM-3 Timeliness of Documents Associated with Change	<p>(See Above.)</p> <p>Exclusions: BellSouth's proposed exclusion for dates that slip less than 30 days "for reasons outside BellSouth control" is too broad.</p> <p>Standard: A Five day interval for documentation changes is too short for ALECs to be able to implement changes. ALECs recommend 30 days for documentation changes, unless it is for error correction, which should be provided within the five day time frame. Further, if the documentation is associated with software changes, 90 days or more is needed for major releases.</p>	<p>BellSouth shall further clarify this statement.</p> <p>We find that the benchmark shall be 98% on time.</p>
CM-4 Average Delay Days for Documentation	Standard: Benchmark should be 98% in 5 days.	We find the benchmark of 95% ≤ 5 days appropriate.

ORDER NO. PSC-01-1819-FOF-TP

DOCKET NO. 000121-TP

PAGE 62

CM-5: Notification of CLEC Interface Outages	Business Rules: BellSouth should explain how it verifies outage and the interval between first notice of outage and verification. If this interval is long, the notice could be delayed and still appear to be on time because of "verification" condition.	We disagree that any change is needed to this metric at this time.
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ATTACHMENT 4

Level of Disaggregation by Metric									
No.	Measure	Interface	Product	Volume	Time Interval	Dispatch Status	Geography State	Region	Mechanization
Pre-Ordering									
OSS-1	Average Response Time for OSS Pre-Order Interfaces & Response Interval	X			X			X	
OSS-2	OSS Interface Availability (All Systems)	X						X	
OSS-3	Interface Availability (M&R)	X						X	
OSS-4	Response Interval (M&R)	X			X			X	
PO-1	Loop Makeup Inquiry (Manual)				X		X	X	
PO-2	Loop Makeup Inquiry (Electronic:BDI, TAG and LENS)				X		X	X	
Ordering									
O-1	Acknowledgment Timeliness (Electronic)	X			X			X	
O-2	Acknowledgment Completeness (Fully Mechanized, Partially Mechanized & Total Mechanized)	X						X	
O-3/4	Percent Order Flow Through (Summary & Detail)	X	X					X	X
O-5	Flow-through Error Analysis								
O-6	CLEC LSR Information - LSR Flow-Through Matrix	X	X						
O-7	Percent Rejected Service Request (Fully mechanized, Partially Mechanized & Non-Mechanized)		X				X	X	X

Level of Disaggregation by Metric									
No.	Measure	Interface	Product	Volume	Time Interval	Dispatch Status	Geography State Region		Mechanization
O-8	Reject Interval		X		X		X	X	X
O-9	Firm Order Confirmation Timeliness (Fully mechanized, Partially Mechanized & Non-Mechanized)		X		X		X	X	X
O-10	Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time (Manual)				X		X	X	
O-11	Firm Order Confirmation and Reject Response Completeness		X				X	X	X
O-12	Speed of Answer in Ordering Center							X	
O-13	LNP - Percent Rejected Service Request		X				X	X	X
O-14	LNP - Reject Interval Distribution & Average Reject Interval		X		X		X	X	X
O-15	LNP - FOC Timeliness Interval Distribution & FOC Average Interval		X		X		X	X	X
	Percent Order Accuracy								
Provisioning									
P-1	Mean Held Order Interval		X	X	X		X	X	
P-2	Average Jeopardy Notice Interval (Electronic) & % Orders Given Jeopardy Notice		X				X	X	X
P-3	Percent Missed Installation Appointments		X	X		X	X	X	